

SRI International, Inc. v. Symantec Corp. and Internet Security Systems, Inc.

C.A. No. 04-1199-SLR

Symantec Corp.'s Trial Exhibit List to SRI International, Inc.

TRIAL EXH. NO.	DESCRIPTION	BEG. BATES NO.	END BATES NO.	OBJECTION BASIS	FRE IN SUPPORT OF ADMISSION
3000	IPS Selection Criteria & SNS	SYM_P_0341091	SYM_P_0341121		
3001	Symantec Gateway Security 5400 Series Sales Overview	SYM_P_0366436	SYM_P_0366501	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3002	Symantec Gateway Security 5400 Series Administrator's Guide	SYM_P_0372848	SYM_P_0373313		
3003	The Complete ManHunt	SYM_P_0381128	SYM_P_0381191		
3004	Unit 18 SESA Collection	SYM_P_0383815	SYM_P_0383848	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3005	SNS Administration Guide	SYM_P_0053881	SYM_P_0054272		
3006	FlowChaser Data Store (FDS) Specification	SYM_P_0134095	SYM_P_0134099	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3007	Invensys/Foxboro outline	SRIE 0373481	SRIE 0373499	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3008	Email from Robert Graham (ISS) re: IDS thoughts	ISS_00178740	ISS_00178741		
3009	Email from Thomas Ptacek (Arbor)	ISS_01452909	ISS_01452910		
3010	IDS Product Feature Comparison	ISS_02035540	ISS_02035543	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3011	PP: Management Competitive Update	ISS2_00472636	ISS2_00472650		
3012	SNS 4.0 Product Sample	SYM_P_0000003	SYM_P_0000003		
3013	FAQ: iFoce IDS v2.0	SYM_P_0009044	SYM_P_0009048		
3014	ManHunt 3.0 R2 Administration Guide	SYM_P_0009721	SYM_P_0010110		
3015	SGS Reference Guide	SYM_P_0012889	SYM_P_0013420		
3016	SGS 5400 Series Administrator's Guide	SYM_P_0013471	SYM_P_0013984		
3017	SNS User Guide	SYM_P_0015029	SYM_P_0015162		
3018	SNS Administration Guide (432 page version)	SYM_P_0016025	SYM_P_0016456		
3019	PP: ManHunt Data Processing	SYM_P_0019204	SYM_P_0019214		
3020	PP: SNS 4.0 Sensor Architecture	SYM_P_0036739	SYM_P_0036749		
3021	PP: ManHunt's Layered Detection	SYM_P_0037697	SYM_P_0037727		
3022	Functional Specification for Symantec ManHunt	SYM_P_0050683	SYM_P_0050707		

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3023	PP: Recourse Product Review	SYM_P_0050735	SYM_P_0050752	FRCP 26	SRI's objection requires clarification
3024	ManHunt Technology vs Traditional Technology: Protocol Anomaly vs Behavior Anomaly	SYM_P_0187244	SYM_P_0187245	106; 402; 403; 602; 802	401, 402, 403, 801, 803, 807
3025	Sony Electronics, Inc. IDS Evaluation [incomplete version]	SYM_P_0187889	SYM_P_0187895	106	
3026	NSS Group IDS Product Questionnaire for ManHunt 3.0	SYM_P_0195683	SYM_P_0195687	402; 403	401, 402, 403
3027	NSS Group IPS Product Review Questionnaire for SNS 7120 and 7160	SYM_P_0195883	SYM_P_0195889	402; 403	401, 402, 403
3028	Symantec Technical Brief re SNS Clustering	SYM_P_0199907	SYM_P_0199916	402; 403	401, 402, 403
3029	Email thread re ManHunt / SNS Flow Alert Rules	SYM_P_0203835	SYM_P_0203838	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3030	RFI Response for Ziff Davis Media re SNS 7100	SYM_P_0204307	SYM_P_0204314	402; 403	401, 402, 403
3031	Email from Wheeler to Janczura re: Response Rules for SNS	SYM_P_0204480	SYM_P_0204483	402; 403	401, 402, 403
3032	Gartner Questionnaire re SNS 7100	SYM_P_0208880	SYM_P_0208898	402; 403	401, 402, 403
3033	FlowChaser Database Parameters	SYM_P_0224570	SYM_P_0224571	106; 402; 403; 602; 802	401, 402, 403, 801, 803, 807
3034	Summary of configurable parameters for SNS	SYM_P_0229173	SYM_P_0229199		
3035	Email re SNS functionality	SYM_P_0237863	SYM_P_0237867		
3036	ManHunt 2.0 Sensor Architecture Spec	SYM_P_0244837	SYM_P_0244839	402; 403	401, 402, 403
3037	Corrections to article re ManHunt 2.0	SYM_P_0251741	SYM_P_0251743		
3038	eNDC 2.0 PFR	SYM_P_0251780	SYM_P_0251806	402; 403	401, 402, 403
3039	Symantec ManHunt Smart Agents FAQ	SYM_P_0255664	SYM_P_0255668		
3040	ManHunt 3.0 User Guide	SYM_P_0256545	SYM_P_0256688		
3041	PP: ManHunt Architecture	SYM_P_0258837	SYM_P_0258851		
3042	FlowNavigator Parameters	SYM_P_0264136	SYM_P_0264137	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3043	SSIM 9500 Series QuickStart!	SYM_P_0283045	SYM_P_0283071		

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3044	Email from Catahan to Tolle re: Sumantec: Network Computing's Secure Enterprise: Review of Network Traffic Anomaly Detection Products	SYM_P_0297896	SYM_P_0297900	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3045	Ursa Major (ManHunt 4.0) PFR	SYM_P_0333695	SYM_P_0333726	106; 402; 403; 602; 802	401, 402, 403, 801, 803, 807
3046	SSIM Support Team Training (Student Guide)	SYM_P_0370343	SYM_P_0370644		
3047	SSIM 4.0 Installation Guide	SYM_P_0379015	SYM_P_0379049		
3048	SGS 5400 Series QuickStart!	SYM_P_0379673	SYM_P_0379693		
3049	PP: xNDC Portscan Detection	SYM_P_0413567	SYM_P_0413586	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3050	Email thread re SNS customer questions	SYM_P_0456813	SYM_P_0456816	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3051	Email thread re DoS detection	SYM_P_0476684	SYM_P_0476687	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3052	ManHunt 3.0 Product Sample	SYM_0513086	SYM_0513086		
3053	SNS 7100 Series Product Sample	SYM_0513087	SYM_0513087	106; 402; 403; 602; 802	401, 402, 403, 801, 803, 807
3054	SGS 5400 Series Product Sample	SYM_0513088	SYM_0513088		
3055	SSIM 9500 Series Product Sample	SYM_0513089	SYM_0513089		
3056	RFI Response for Ziff Davis Media re SNS 7100 (alternate version)	SYM_P_0532554	SYM_P_0532560	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3057	Email thread re anomaly detection	SYM_P_0541803	SYM_P_0541809		
3058	Financial data indicating which customers have purchased which accused products - produced in response to SRI's Rog 17	SYM_P_0553071	SYM_P_0553071		
3059	Declaration of Jeremy F. Bennett	SYM_P_0605159	SYM_P_0605162	802; FRCP 37 (untimely produced)	801, 803, 807, Disclosed no later than 6/1/06 in Symantec's Summary Judgment re Non-Infringement

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TRIAL EXH. NO.	DESCRIPTION	BEG. BATES NO.	END BATES NO.	OBJECTION BASIS	FRE IN SUPPORT OF ADMISSION
3060	Declaration of Brandon Suzuki	SYM_P_0605163	SYM_P_0605166	802; FRCP 37 (untimely produced)	801, 803, 807, Disclosed no later than 6/1/06 in Symantec's Summary Judgment re Non-Infringement
3061	Copy Port and ManHunt Sensor Interface Nodes	SYM_P_0263725	SYM_P_0263727		
3062	Email from Stavridou to Bercow re: Recourse - Moran no longer at Recourse.	SRIE 0305733	SRIE 0305734		
3063	Email from Bercow to Karl Hutter re: follow-up on prior conversation re: areas Recourse might want to consider that SRI has put its efforts into.	SRIE 0077329	SRIE 0077329		
3064	Document entitled, "Introduction" - outline for developing relationship involving technology transfer with Recourse	SRIE 0126661	SRIE 0126662	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3065	ManHunt Release History	SYM_P_0266896	SYM_P_0266907		
3066	Press Release: MH 1.2 available	SYM_P_0344432	SYM_P_0344435		
3067	Teal Invoices and Billing Records	TEA_0002879	TEA_0002884	802	801, 803, 807
3068	Email from Staudenraus to Porras with copy to Bercow, Platon and Staudenraus re: Technical Due Diligence	SRIE 0042166	SRIE 0042166	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3069	Slide Descriptions Technical Plan Summary v0.1. Contributors include Phil Porras (SRI), Oliver Friedrichs (Symantec), Brian Hernacki (Symantec), Juanita Koilpillai (Symantec), Patrick Lincoln (SRI) and Carey Nachenberg (Symantec)	SRI 098098	SRI 098105		
3070	Email from Lindqvist to Siciliano et al re: SOW for Symantec	SRIE 0061887	SRIE 0061887		

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TRIAL EXH. NO.	DESCRIPTION	BEG. BATES NO.	END BATES NO.	OBJECTION BASIS	FRE IN SUPPORT OF ADMISSION
3071	Memo re EMERALD commercial discussions	SRI 087670	SRI 087670	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3072	Email re Chat + Symantec	SRI 284008	SRI 284008		
3073	Letter from Schallop to Abramson declining license to SRI's patents	SRI 284281	SRI 284281		
3074	SYMC Corporate Info Webpage	SRI 286548	SRI 286552		
3075	Email from Porras to EMERALD development team re ManHunt sql slammer filter rule	SRIE 0001234	SRIE 0001234	402; 403	401, 402, 403
3076	Email from Stsudenraus to Bercow re: Symantec and AlertSoft/SRI	SRIE 0044184	SRIE 0044184	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3077	Email re Symantec RFP WS088	SRIE 0061770	SRIE 0061770		
3078	Email enclosing Hernacki Bio	SRIE 0063759	SRIE 0063759	602; 802; 901	801, 803, 807, 901
3079	Email re Draft CyberShield Technical Plan	SRIE 0080941	SRIE 0080942		
3080	Email from Bercow to Porras et al. re: SQL Slammer Filter Rule	SRIE 0246467	SRIE 0246467	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3081	Email re: Final version of DIME proposal	SRIE 0289942	SRIE 0289942		
3082	Minutes from Weekly CyberShield Team Telecon	SRIE 0320604	SRIE 0320606		
3083	Email re FYI: Symantec VP picked as gov't cybersecurity czar	SRIE 0474267	SRIE 0474267	602; 802; 901	801, 803, 807, 901
3084	SYMC 2001 Annual Report	SYM_P_0185935	SYM_P_0185992		
3085	SYMC 2002 Annual Report	SYM_P_0185993	SYM_P_0186012		
3086	SYMC 2003 Annual Report	SYM_P_0186102	SYM_P_0186177		
3087	SYMC 2005 Annual Report	SYM_P_0186258	SYM_P_0186279		
3088	SYMC 2004 Annual Report	SYM_P_0186178	SYM_P_0186257		
3089	2006 SYMC Corporate Fact Sheet	SYM_P_0605200	SYM_P_0605204		

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3090	Source Code in "manhunt/src/flownav/fds" directory	Exhibit 3090 is a compilation of each file in the indicated directory. It was identified as "relevant source code" associated with Manhunt's Flow Alert mechanism and FlowChaser data store. 5/16/06 Hansen Report at 13. This source code has been available to SRI at Symantec's escrow facility since 12/2/05.		Insufficient description - SRI reserves all objections	Disclosed no later than 5/16/06 in Hansen Report
3091	SSIM 9500 Event Collectors	SYM_P_0605158	SYM_P_0605158	FRCP 37 (untimely produced)	Disclosed no later than 9/13/06
3092	Sony Electronics, Inc. IDS Evaluation	SYM_P_0605145	SYM_P_0605157	FRCP 37 (untimely produced)	Disclosed no later than 9/13/06
3093	Copy Port and ManHunt Sensor Interface Nodes	SYM_P_0263725	SYM_P_0263727	402; 403	401, 402, 403
3094	Emerald Business Plan	SRI 109482	SRI 109486	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3095	Eighth Intrusion Detection Workshop schedule and attendees list	SRI 011417	SRI 011420		
3096	Exhibit A: Business Issues Outlines for Emerald Development Environment	SRI 144564	SRI 144572	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3097	Business Issues Outline for Emerald Development Environment	SRI 097738	SRI 097746	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3098	Email from Porras to Lindqvist re P-Best and IPR	SRIE 0018952	SRIE 0018952		
3099	Outline of Terms for Software Distribution Agreement Between SRI International and Infinity Technology Services, Inc.	SRI 144689	SRI 144693	402; 403; 602; 802	401, 402, 403, 801, 803, 807

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3100	Emerald Licensing Program, VLB	SRIE 0354883	SRIE 0354899	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3101	Evaluation Software License Agreement, Contract No. BET-090903-083	SRIE 019375	SRI 019379	402; 403; 602; 802	401, 402, 403, 801, 803, 807
3102	End of Live and End of Support dates for Symantec security gateway products from service1.symantec.com/support/ent- gate.nsf/854fa02b4f5013678825731a007d06af/d4e 655703caabe7d8825745f007bfa6c?OpenDocumen t			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3103	Release Details - Gateway Security 5000 Series versions 1.0, 2.0, 2.0.1, 3.0, and 3.0.1 from www.symantec.com/business/support/release_detai ls.jsp?pid=51963			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3104	Release Details - Gateway Security 1600 Series versions 3.0, and 3.0.1 from www.symantec.com/business/support/release_detai ls.jsp?pid=53078			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3105	Release Details - Network Security version 4.0.x from www.symantec.com/business/support/release_detai ls.jsp?pid=51994			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3106	Release Details - Incident Manager version 3.0 from www.symantec.com/business/support/release_detai ls.jsp?pid=51969			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3107	Press release: "Symantec Announces Beta Availability Of Revolutionary Security Information Management Appliance"			402, 403, 801, 802, 901, FRCP 37 (untimely produced)	401, 402, 403, 801, 803, 807, 901, 902, FRCP 26(e), 37(c)

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3108	Symantec Security Response - ManHunt Security Updates from www.symantec.com/avcenter/security/Content/Product/Product_MH.html			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3109	Introduction to Symantec ManHunt 3.0 from service1.symantec.com/SUPPORT/intrusiondetect/kb.nsf/docid/2003050909004553?OpenDocument&src=ent_hot&dtype=corp&prod=Symantec%20ManHunt&ver=3.0.x&tpre=			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3110	Release Details - ManHunt versions 1.0, 1.1, 1.2, 2.0, 2.1, 2.11, 2.2, and 3.0 from www.symantec.com/business/support/release_details.jsp?pid=51988			402, 403, 901, FRCP 37 (untimely produced)	401, 402, 403, 901, 902, FRCP 26(e), 37(c)
3111	SGS 5600 Series Product Sample			403, 901, FRCP 37 (untimely produced)	401, 403, 901, 902, FRCP 26(e), 37(c)
3112	SGS 1600 Series Product Sample			403, 901, FRCP 37 (untimely produced)	401, 403, 901, 902, FRCP 26(e), 37(c)
3113	Symantec Incident Manager 3.0 Product Sample			403, 901, FRCP 37 (untimely produced)	401, 403, 901, 902, FRCP 26(e), 37(c)